

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ABDIQAFAR WAGAFE, *et al.*, on behalf
of themselves and others similarly situated,

Plaintiffs,

v.

JOSEPH R. BIDEN, President of the
United States, *et al.*,

Defendants.

No. 2:17-cv-00094-RAJ

**JOINT STIPULATION FOR ORDER
ALLOWING REDACTED FILINGS OF
SUMMARY JUDGMENT BRIEFING
DESIGNATED AS HIGHLY SENSITIVE
DOCUMENTS PENDING RESOLUTION
OF THE MOTIONS TO SEAL**

WHEREAS the Court's General Order No. 03-21 ("General Order") states that highly sensitive documents ("HSD") cannot be filed on the public docket; and

WHEREAS guidance from the Court Clerk also indicates that documents or filings that discuss or contain information from HSDs also cannot be filed on the public docket; and

WHEREAS Defendants state that Plaintiffs' Motion for Summary Judgment, Defendants' Opposition to Plaintiffs' Motion for Summary Judgment and Cross Motion for Summary Judgment, Plaintiffs' Reply and Opposition to Defendants' Cross Motion, Defendants' Reply, and the Third Declaration of Jennifer Pasquarella¹ (collectively the "Filings") contain information from and discuss the content of documents produced in this case that Defendants have designated as HSD; and

WHEREAS as a result, none of the Filings appear on the public docket, in any form; and

¹ Docket numbers are unavailable for the Filings because the Filings were not filed on the public docket.
JOINT STIPULATION FOR ORDER ALLOWING REDACTED
FILINGS OF DOCUMENTS DESIGNATED UNDER GENERAL
ORDER NO. 03-21.

1 WHEREAS Plaintiffs dispute Defendants' designation of certain produced documents as
2 HSD, *see* Dkts. 464, 483, 502, 513, 533, 536, 543, 560, 562, and 566; and

3 WHEREAS the parties believe that, notwithstanding their disagreement, the proposed
4 stipulated order will enable the parties to comply with LCR 7(g)(5)(A), which requires a publicly
5 filed redacted version of any brief filed under seal,

6 NOW THEREFORE the parties do hereby stipulate and agree that the Court may make
7 and enter the following order:

8 1. The parties shall file mutually agreed upon redacted versions of the Filings on the
9 public docket pending resolution of the Motions to Seal. These redacted versions shall be filed
10 on the public docket regardless of whether the Filings contain or discuss information contained
11 in HSDs.

12 2. The redacted filed versions shall keep hidden from public access any information
13 Defendants assert to be HSD and/or subject to a protective order issued in this case. *See* Dkts.
14 86, 183, 192, 274.

15 3. The parties shall file the redacted Filings within three weeks from the date this
16 stipulation is entered by the Court, unless otherwise ordered by the Court.

17 4. Nothing in this stipulation resolves or shall be construed as resolving the pending
18 motions regarding Defendants' HSD designations and to seal the summary judgment briefs and
19 supporting papers. *See* Dkts. 464, 483, 502, 513, 533, 536, 543, 560, 562, and 566 (HSD); and
20 Dkts. 465, 481, 510, 514, 534, 538, 544, 561, 564, and 567 (Sealing).

SO STIPULATED.

DATED: July 15, 2021

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SO STIPULATED.

DATED: July 15, 2021

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ORDER

IT IS SO ORDERED.

DATED: , 2021.

RICHARD A. JONES
United States District Judge